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Reply to: Theresa Noble Hill
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September 7, 2007

Via Email and Mail

J. Trevor Hammons
State of Oklahoma
Assistant Attorney General
313 NE 21st Street
Oklahoma City, OK 73105

Re: *State of Oklahoma v. Tyson, et al.*

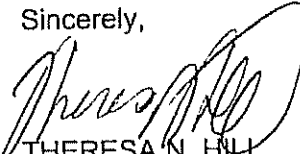
Dear Trevor:

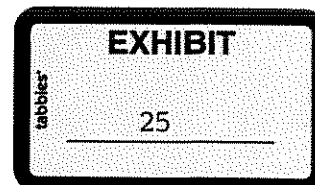
I am writing in response to your letter dated August 24, 2007 concerning the completion of the State's document production.

My letter of August 17, 2007 simply requested dates to complete the production of documents at all remaining State agencies or offices with documents responsive to outstanding discovery requests. In addition to mischaracterizing the extent of the State's remaining obligation to produce documents, your letter is non-responsive in that it provides no firm dates when the State will complete this portion of its document production.

The State's failure to timely produce its responsive documents is impeding our ability to prepare our defense in this case in accordance with the Scheduling Order. Having tried many times to discuss this issue with the State to no avail, we now believe we have no other choice but to seek appropriate relief from the Court.

Sincerely,


THERESA N. HILL



TNH:man

cc: Defense Counsel